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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment to Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information

CC Docket No. 93-55

The United States Telephone Association (USTA) respectfully submits these comments to the Notice of Proposed Rulemaking (NPRM) issued in the above-captioned proceeding.

In accordance with the Metric Conversion Act of 1975,¹ the Commission has sought comments to amend Part 61 of its rules. 47 C.F.R. Part 61. The Commission stated that

metric units and rates.² The Commission proposed to allow carriers a period of two years to make the necessary conversion adjustments as they routinely file tariff revisions.³

USTA strongly supports the Commission's tentative decision not to require a special tariff filing for implementing the metric conversion. The two year transition -- on a prospective basis -- to the metric system

is measurable and would eliminate much of the confusion

For example, when changing existing miles to kilometers, the conversion factor (1 x 1.6093, rounding to the nearest whole number) should be clearly shown. The Commission has successfully applied this type of "editorial change" format to the Instructions and Schedules section in the carriers' Annual Report Form M.⁵ It should likewise adopt the same format here.

Options 2 and 3, on the other hand, are more cumbersome for the carriers, with no additional, real benefits to customers. Each could be inconsistent with state tariffs which do not require metric conversion; thus causing customer confusion. They could lead indirectly to significant additional costs for carriers.

Finally, in the procedural matters section of the NPRM, the Commission defined the term "carriers" to mean local exchange carriers only.⁶ USTA believes that the scope of any order for metric conversion should be sufficiently broad to encompass all carriers who file tariffs with the Commission. Thus, the term "carriers" should include interexchange carriers, alternative service providers, and

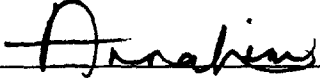
⁵ See Annual Report Form M - Conversion to the Metric System, RAO Letter 18, DA 91-677, rel. June 7, 1991.

⁶ NPRM at ¶ 16.

resellers as well. The Commission will not be in compliance with the 1975 Metric Conversion Act if its order applies to local exchange carriers only.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

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May 26, 1993

CERTIFICATE OF SERVICE

I, Virginia C. Brown, do certify that on May 26, 1993 copies of the foregoing Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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